

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 2:03cr
)	
)	18 U.S.C. § 1029(a) (2)
)	Use of Unauthorized
v.)	Access Devices (Count 1)
)	
)	18 U.S.C. § 1341
CRAIG LEWIS RUNYON)	Mail Fraud (Count 2)

CRIMINAL INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about June 2000 through February 2002, the exact dates being unknown, in Virginia Beach, Virginia, within the Eastern District of Virginia, defendant CRAIG LEWIS RUNYON, did knowingly, with intent to defraud, and in a manner affecting interstate commerce, use one or more unauthorized access devices during a one-year period and by such conduct did obtain cash, goods, and merchandise having a value aggregating \$1,000 or more; that is, the defendant applied, by means of the Internet, for credit cards in the name of an acquaintance, Susan D. Mize, without her knowledge and permission, and, after receiving those cards from Juniper Bank (account #s 5140 2100 0183 6878 and 5140 2100 0183 6860) and American Express (account # 3715 173805 51006 and #3715 173805 51014), illegally used these unauthorized access devices to obtain money and goods to which he was not entitled, thereby causing Juniper Bank and American Express to suffer losses.

(In violation of Title 18, United States Code, Section 1029(a) (2)).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From in or about April 1999 through in or about January 2001, the exact dates being unknown, in Virginia Beach, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, CRAIG LEWIS RUNYON, knowingly devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice, and the execution thereof, operated in substance as follows:

1. The object of the fraudulent scheme and artifice devised by CRAIG LEWIS RUNYON were monies belonging to an acquaintance, Nancy Lewis, which RUNYON sought to obtain and to convert to his own use.

2. It was a part of said scheme and artifice that, in the Spring and Summer of 1999, CRAIG LEWIS RUNYON solicited Nancy Lewis to provide him with monies that he falsely promised to invest upon her behalf in "certain investment vehicles chosen for their likelihood of experiencing very rapid appreciation in value" and in "certain [r]eal [e]state . . . ventures"

3. As part of said scheme and artifice, CRAIG LEWIS RUNYON entered into an investment agreement and addendum with Nancy Lewis designed to mislead her into believing that her monies would truly be invested as promised, when, in fact, CRAIG LEWIS

RUNYON used those monies, among other things, to go gambling and to buy himself a Cadillac for approximately \$26,000.

4. As part of said scheme and artifice, after receiving Nancy Lewis' initial investment of \$10,000, CRAIG LEWIS RUNYON advised her that, in less than a year, her investment had increased in value to approximately \$17,000, when the defendant then and there well knew that this was not true.

5. On or about August 24, 1999, in the Eastern District of Virginia, for the purpose of executing the aforesaid scheme and artifice and attempting to do so, CRAIG LEWIS RUNYON did knowingly take and receive from the United States mails an envelope sent to him in Virginia Beach, Virginia, containing any matter or thing, to wit: a \$40,000 cashier's check bought by Nancy Lewis and made payable to CRAIG RUNYON.

(In violation of Title 18, United States Code, Section 1341).

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